

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN
DISASTER SITE LITIGATION

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FLORA B DAVILA,

Plaintiff(s), Index No.: 07cv4463

-against-

NOTICE OF ADOPTION

1:21-MC-00102-AKH

1221 AVENUE HOLDINGS, LLC, 233
BROADWAY OWNERS, LLC, 59 MAIDEN
LANE ASSOCIATES, LLC, ALAN KASMAN
DBA KASCO, ANN TAYLOR STORES
CORPORATION, BATTERY PARK CITY
AUTHORITY, BFP ONE LIBERTY PLAZA CO.,
LLC,, BLACKMON-MOORING-STEAMATIC
CATASTOPHE, INC. D/B/ABMS CAT, BOARD
OF EDUCATION OF THE CITY OF NEW
YORK, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS,
LP, BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC., CONSTITUTION REALTY
LLC,DEPARTMENT OF BUSINESS SERVICES,
ENVIROTECH CLEAN AIR, INC., GENERAL
RE SERVICES CORP., GPS ENVIRONMENTAL
CONSULTANTS, INC., HILLMAN
ENVIRONMENTAL GROUP, LLC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC., J.P.
MORGAN CHASE CORPORATION, KASCO
RESTORATION SERVICES CO., MAZAL
GROUP (THE MONIAN GROUP), MERRILL
LYNCH & CO, INC., NATIONAL
ASSOCIATION OF SECURITIES DEALERS,
INC., NEW LIBERTY PLAZA LP, NEW YORK
CITY ECONOMIC DEVELOPMENT
CORPORATION, NEW YORK CITY
INDUSTRIAL DEVELOPMENT AGENCY, NEW
YORK CITYINDUSTRIAL DEVELOPMENT
CORPORATION, NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY, NEW YORK
UNIVERSITY, NEWARK KNIGHT FRANK,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL,

INC., ONE LIBERTY PLAZA, ROCKROSE DEVELOPMENT CORP., STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THAMES REALTY CO, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TOSCORP INC., TRIBECA LANDING L.L.C., TUCKER ANTHONY, INC., VERIZON COMMUNICATIONS, INC., VERIZON NEW YORK, INC, VERIZON PROPERTIES, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York
September 11, 2007

Yours, etc.,

SAM ROSMARIN, PLLC



By: _____
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AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the
SERVICE RIDER



Cristina A. Villani

Sworn to before me this
11th day of September 2007



Charlene S. Rogers
Notary Public
No. 01RO 4703494
Qualified in Westchester County
Commission Expires 11/30/09